

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**WOLO MANUFACTURING, CORP.,**

Plaintiff,

v.

**ABC CORP. d/b/a Vixenhorns.com, XYZ  
CORP. d/b/a Hookedontronics.com, AFTAK  
CORP. d/b/a Aftakcorp.com and ARIE  
FELDMAN,**

Defendants.

**Case No. 17-cv-5333**

**COMPLAINT**

Plaintiff, Wolo Manufacturing, Corp. (“Wolo”), by and through its attorneys, Lackenbach Siegel, LLP, for its complaint against defendants, ABC Corp. d/b/a Vixenhorns.com (“Vixen”), XYZ Corp. d/b/a Hookedontronics.com (“Tronics”), Aftak Corp. d/b/a Aftakcorp.com (“Aftak”) (Vixen, Tronics and Aftak are collectively the “Defendant Entities”) and Arie Feldman (“Feldman”)(all collectively, “Defendants”), hereby alleges as follows:

**NATURE OF ACTION**

1. Defendants, apparently desirous of entering into competition with Wolo in the automotive aftermarket for goods such as automotive horns and sirens, simply copied large portions of Wolo’s product line and accompanying product packaging and literature. In so doing, however, Defendants unfairly and illegally competed with Wolo by copying Wolo’s protected intellectual property.

2. Thus, in this action, Wolo seeks injunctive relief, lost profits, damages and attorneys’ fees for Defendants’ acts of willful copyright infringement, pursuant to the Copyright

Act, 17 U.S.C. 501 *et seq.*, trademark infringement, false designation of origin and unfair competition, pursuant to the Lanham Act, 15 U.S.C. §§ 1051 *et seq.*, and trademark infringement and dilution, deceptive acts and practices, injury to business reputation and dilution, and unfair competition under the common law and statutes of the State of New York.

**THE PARTIES**

1. Wolo is a corporation organized and existing under the laws of the State of New York, having its principal place of business at 1 Saxwood Street, Deer Park, New York 11729.

2. Upon information and belief, defendant Vixen is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

3. Upon information and belief, defendant Tronics is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

4. Upon information and belief, defendant Aftak is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

5. Upon information and belief, Feldman is a resident of Florida.

6. Upon information and belief, Feldman is the owner, president, officer, manager, member, operator and/or is directing the business and actions, of the Defendant Entities.

**JURISDICTION AND VENUE**

7. This Court has jurisdiction over the subject matter of this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331, 1338, and 1367.

8. The actions of Defendants complained of in this Complaint have been and continue to be committed, at least in part, within the Eastern District of New York.

9. Upon information and belief, defendant Vixen is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

10. Upon information and belief, defendant Tronics is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

11. Upon information and belief, defendant Aftak is a corporation organized and existing under the laws of the State of Florida, with its place of business in Florida.

12. Upon information and belief, Feldman is a resident of Florida.

13. Upon information and belief, Feldman is the owner, president, officer, manager, member, operator and/or is directing the business and actions, of the Defendant Entities.

14. Upon information and belief Defendants contract to supply goods and/or services, and/or transact business in New York and within this judicial district; and the tortious acts of Defendants complained of in this Complaint, including, without limitation, the willful and illegitimate use of Wolo's copyrights, trademarks and goodwill, have caused harm to Wolo within this judicial district. Accordingly, personal jurisdiction exists over Defendant pursuant to CPLR §§ 301 and 302.

15. Defendants maintain "active" websites which permits customers to purchase goods from Defendants directly from their websites.

16. Upon information and belief, Defendants' customers include residents of New York State and Defendants have shipped goods into New York State and within this Judicial District, including goods which form the basis of this Complaint.

17. Venue is proper in this district pursuant to 28 U.S.C. § 1391.

### **FACTUAL ALLEGATIONS**

18. Wolo, founded in 1965, designs and sells a variety of automotive accessories, including horns, alarms, sirens, warning lights, and light bars.

19. Wolo is widely considered one of the leaders in its field. Wolo's goods are sold by leading automotive goods retailers such as Pep Boys, AutoZone, O'Reilly Auto Parts, and Advance Auto Parts.

20. Wolo additionally sells its products directly to customers via its own website, <https://wolo-mfg.com/> ("Wolo's Website") and through third party websites, such as Amazon.

21. Wolo's Website contains and displays photographs of its authentic goods.

22. Wolo's Website additionally displays written descriptions, details and specifications relating to its products, and provides written instructions and videos demonstrating the installation of its products.

### **Wolo's Copyright and Trademark**

23. Wolo owns U.S. Copyright Registration No. TX 8-391-412 (the "Copyright Registration") for two-dimensional artwork and text material (collectively, the "Work"). A true and correct copy of the Work and the Copyright Registration is attached to this Complaint as Exhibit 1.

24. The Work was and is reproduced and distributed by Wolo with certain of its products and is additionally displayed and/or available for download on the Wolo Website.

25. Wolo owns all rights under the United States copyright laws pertaining to, and/or inherent in, the Work (the "Copyright"), which Copyright is valid and subsisting.

26. The Work was completed and first published on or before December 31, 2008.

27. The Copyright Registration constitutes *prima facie* evidence of the validity, and of Wolo's ownership, of the Copyright in the Work.

28. In connection with its business and products, Wolo has adopted and used, and Wolo is the owner of numerous registered and common law trademarks.

29. One such trademark that Wolo has adopted and is using, is the carbon fiber-look mark – the ornamental appearance of carbon fiber style graphics applied in an arbitrary fashion to a portion of a Wolo-product (the “Mark”).

30. One such product that uses the Mark is the Wolo Bandido Power Air Horn (the “Bandido Horn”). A true and accurate copy of the Bandido Horn utilizing the Mark is attached to this Complaint as Exhibit 2.

31. The Mark is inherently distinctive and strong.

32. The Mark is currently in use and has never been abandoned.

33. Because of Wolo’s extensive use and promotions of the Mark, and Wolo’s use of “look for” advertising and trademark marking pertaining to the Mark, the Mark has become distinctive and prominent, and indicates a single source of origin of Wolo’s goods, and has acquired a secondary meaning.

34. Wolo continuously utilizes, offers for sale and/or sells, Wolo’s products, Wolo’s Website, Wolo’s Work, Wolo’s Mark and/or other words, terms, symbols, and/or devices commonly used by Wolo, during the course of its everyday business (collectively “Wolo’s IP”).

### **Defendants’ and Their Illegal Activities**

35. Upon information and belief, Feldman is and has always been the owner, president, officer, manager, member, operator and/or is directing the business and actions, of the Defendant Entities, and Feldman alone directs and controls all of the activities of the Defendant Entities.

36. Defendants are direct competitors of Wolo. Defendants sell a variety of automotive horns and related accessories.

37. Upon information and belief, Defendants Vixen and/or Feldman (and/or any combination of Defendants), own(s) and operate(s) the website <https://vixenhorns.com> (the “Vixen Webiste”), which offers for sale and sells a variety of automotive horns and related accessories.

38. Upon information and belief, Defendants Tronics and/or Feldman (and/or any combination of Defendants), own(s) and operate(s) the website <http://www.hookedontronics.com> (the “Tronics Website”), which offers for sale and sells a variety of automotive horns and related accessories, including Vixen automotive products.

39. Upon information and belief, Defendants Aftak and/or Feldman (and/or any combination of Defendants), own(s) and operate(s) the website <http://www.aftakcorp.com> (the “Aftak Website”), which offers for sale and sells a variety of automotive horns and related accessories, including Vixen automotive products.

40. Upon information and belief, Defendants (and/or any combination of Defendants) offer for sale and sells their products on Amazon.com and Jet.com.

41. Without license or authority from Wolo, Feldman (and/or any combination of Defendants) caused Vixen to copy Wolo’s Work, and without license or authority from Wolo, Vixen reproduced and published two (2) different unauthorized copies of the Work (one for Vixen’s horn model number VXH4114 and the other for Vixen’s horn model number VXH4114B) (collectively the “Infringing Works”). A True copy of the Infringing Works are attached to this Complaint as Exhibit 3.

42. Without license or authority from Wolo, Feldman (and/or any combination of Defendants) caused Vixen, without license or authority from Wolo, to publish and make the Infringing Works available for view, display, and further copying by the public by posting it to the Vixen Website. A True copy of a page from the Vixen Website, utilizing the link <https://vixenhorns.com/wp-content/uploads/2017/04/VXH4114.pdf>, that provides a downloadable copy of the Infringing Works, designated as “PDF MANUAL,” is attached to this Complaint as Exhibit 4.

43. Upon information and belief, Defendants (or a combination thereof) use the Vixen Website to advertise and promote Defendants’ automotive products and accessories.

44. By publishing and displaying the Infringing Works on the Vixen Website, Defendants (or a combination thereof) have utilized the Work without license or authority from Wolo, thereby infringing Wolo’s Copyright, to generate revenue through the marketing, advertising, and sale of Defendants’ goods.

45. Without license or authority from Wolo, Feldman (and/or any combination of Defendants) caused Tronics, without license or authority from Wolo, to publish and make the Infringing Works available for view, display, and further copying by the public by posting it to the Tronics Website. A True copy of a page from the Tronics Website, utilizing the link <https://www.hookedontronics.com/images/horns/manuals/VXH4114.pdf>, that provides a downloadable copy of the Infringing Works, designated as “DOWNLOAD MANUAL,” is attached to this Complaint as Exhibit 5.

46. Upon information and belief, Defendants (or a combination thereof) use the Tronics Website to advertise and promote Defendants’ automotive products and accessories.

47. By publishing and displaying the Infringing Works on the Tronics Website, Defendants (or a combination thereof) have utilized the Work without license or authority from Wolo, thereby infringing Wolo's Copyright, to generate revenue through the marketing, advertising, and sale of Defendants' goods.

48. Without license or authority from Wolo, Feldman (and/or any combination of Defendants) caused Aftak, without license or authority from Wolo, to publish and make the Infringing Works available for view, display, and further copying by the public by posting it to the Aftak Website. A True copy of a page from the Aftak Website, utilizing the link, <https://www.hookedontronics.com/images/horns/manuals/VXH4114.pdf>, that provides a downloadable copy of the Infringing Works, designated as "DOWNLOAD MANUAL," is attached to this Complaint as Exhibit 6.

49. Upon information and belief, Defendants (or a combination thereof) use the Aftak Website to advertise and promote Defendants' automotive products and accessories.

50. By publishing and displaying the Infringing Works on the Aftak Website, Defendants (or a combination thereof) have utilized the Work without license or authority from Wolo, thereby infringing Wolo's Copyright, to generate revenue through the marketing, advertising, and sale of Defendants' goods.

51. Defendants (or a combination thereof) copied Wolo's Work, and without license or authority from Wolo, published unauthorized copies of the Work and made it available for view, display, and further copying by the public by posting it to Amazon.com and Jet.com in connection with the sale of Defendants' products. A True copy of an example of Defendants' Amazon.com postings, utilizing a link designated as "User Manual" at <https://images-na.ssl->

[imagesamazon.com/images/I/C1FV39 nngMS.pdf](http://imagesamazon.com/images/I/C1FV39 nngMS.pdf), that allows for the view, display, and further copying of the Infringing Works is attached to this Complaint as Exhibit 7.

52. Upon information and belief, Defendants (or a combination thereof) use the Infringing Work to advertise and promote Defendants' automotive products and accessories offered for sale and sold on Amazon.com and Jet.com.

53. By publishing and displaying the Work on Amazon.com and Jet.com postings, Defendants (or a combination thereof) have utilized the Work without license or authority from Wolo, thereby infringing Wolo's Copyright, to generate revenue through the marketing, advertising, and sale of Defendants' goods.

54. Upon information and belief, due to the verbatim copying and display of the Work, Defendants were aware of and obtained the Work from Wolo and intentionally copied the Work.

55. Defendants (or a combination thereof) are offering for sale and selling a power air horn designated as the VIXEN HORNS VXH1608CB COMPACT DUAL-TONE MOTORCYCLE ELECTRIC AIR HORN CARBON-FIBER BLACK (the "Infringing Horn"). A True copy of a page from the Vixen Website promoting and offering for sale the Infringing Horn is attached to this Complaint as Exhibit 8.

56. Defendants (or a combination thereof) have used and are using Wolo's Mark on the Infringing Horn, and have created and are creating a likelihood of confusion in violation of the Lanham Act, and/or have created and are creating an impression that Defendants otherwise are affiliated with or sponsored by Wolo (the "Infringing Horn").

57. Without the authorization or consent of Wolo, and after Wolo built up extensive and valuable business and goodwill in connection with the Mark, Defendants commenced to offer for sale and sell the Infringing Horn.

58. Upon information and belief, each of the Defendants were aware of Wolo and Wolo's use of its Mark in connection with Wolo's goods at the time Defendants adopted and began to use Wolo's Mark on the Infringing Horn.

59. Wolo and Defendants have been, and are, engaged in the business of providing similar products to the same classes of customers, through the same and/or similar channels of trade.

60. Upon information and belief, Defendants adopted and commenced use of Wolo's Mark on the Infringing Horn with the intent to deceive consumers and to cause confusion among purchasers for the purpose of benefitting from the goodwill and public recognition associated with Wolo's Mark and diverting sales from Wolo to Defendants.

61. In addition to the copying of Wolo's Work and Mark, Defendants have also copied, offer for sale and/or sell a large portion of Wolo's product line, other written materials and Wolo's overall market presence, including Wolo's IP.

62. Upon information and belief, it appears that Defendants are attempting to become an exact copy of Wolo, by copying, duplicating and/or utilizing Wolo's IP without spending the time and money to research or develop their own products or to establish Defendants' own reputation and goodwill.

**COUNT I**  
**COPYRIGHT INFRINGEMENT**

63. Wolo repeats and realleges each of the allegations made in the preceding paragraphs as if set forth fully herein.

64. Wolo is the owner of the Work, which constitutes original and copyrightable subject matter under the copyright laws of the United States, and Wolo has duly complied with all of the relevant provisions of Title 17 of the United States Code with respect thereto.

65. Wolo has duly requested and secured from the Register of Copyrights a Certificate of Registration for the Work, namely the Copyright Registration annexed hereto at Exhibit 1.

66. Defendants have infringed Wolo's Copyright in and to the Work embodied in the Copyright Registration, by copying, publishing and displaying the Work and/or photographs, text, and/or two-dimensional artwork which are identical and/or substantially similar to the Work on the Vixen Website, Tronics Website, Aftak Website and various Amazon.com and Jet.com postings, all in violation of Title 17 of the United States Code.

67. Upon information and belief, Defendants' conduct and infringement of Wolo's rights have been willful and deliberate.

68. Upon information and belief, Defendants' unlawful actions have interfered with Wolo's sales of its products and accessories, have unfairly diverted revenue to Defendants and have caused Wolo monetary damage.

69. The acts of Defendants have caused irreparable harm and damage to Wolo and will continue to cause irreparable harm to Wolo, and have caused Wolo to suffer monetary damage in an amount thus far not determined.

70. Wolo has no adequate remedy at law for the injury alleged in this count, and said injury is, in part, intangible in nature and not capable of being fully measured or valued entirely in terms of monetary damages.

71. Upon information and belief, Defendants will continue to infringe Wolo's rights unless enjoined by this Court.

72. Based upon Defendants' acts of infringement, Wolo is entitled to injunctive relief, monetary damages, and its costs and fees.

**COUNT II**  
**COPYRIGHT INFRINGEMENT**

73. Wolo repeats and realleges each of the allegations made in the preceding paragraphs as if set forth fully herein.

74. In addition to the Work, Wolo owns other rights in and to numerous other copyrighted works (the "Other Works").

75. Upon information and belief, Defendants have infringed Wolo's copyright in and to the Other Works, by copying, publishing and displaying photographs, text, and/or two-dimensional artwork which are identical and/or substantially similar to the Other Works, on other Amazon.com and Jet.com posting and/or other websites associated with and/or owned by Defendants, all in violation of Title 17 of the United States Code.

76. The full nature and extent of Defendants' copying is not currently known to Wolo, and Wolo seeks leave to amend its Complaint against Defendants to include all instances of copyright infringement when Wolo learns of the full nature and extent of Defendants' copying through the discovery process.

**COUNT III**  
**TRADEMARK INFRINGEMENT and FALSE DESIGNATION OF ORIGIN**  
**(LANHAM ACT § 43(a))**

77. Wolo repeats and realleges each and every allegation contained in the prior paragraphs hereto, and the same are incorporated herein and made a part hereof.

78. Wolo is the owner in and to the Mark.

79. The Mark is inherently distinctive.

80. The Mark has acquired distinctiveness and a secondary meaning.

81. The Mark is a strong trademark based on both its inherent and commercial strength.

82. Defendants' use of the Mark on the Infringing Horn creates a likelihood of confusion with Wolo, Wolo's Mark, and Wolo's goods offered and sold in connection with the Mark.

83. The use of the Mark on the Infringing Horn is identical to and confusingly similar with the Mark.

84. Wolo's goods and services are offered, sold, distributed, furnished and/or advertised to the same or similar classes of purchasers as Defendants' goods and services.

85. Upon information and belief, Defendants were aware of Wolo and of Wolo's use of its Mark prior to the time Defendants selected and commenced use of Wolo's Mark on the Infringing Horn.

86. Upon information and belief, based upon, without limitation, the similarity of Wolo's Mark and the Infringing Horn, and Defendants' prior knowledge of Wolo and Wolo's use of its Mark, Defendants adopted and used Wolo's Mark with the intent to cause confusion among consumers and with the purpose of benefitting from Wolo's reputation and goodwill, and Defendants' conduct constitutes willful trademark infringement and unfair competition.

87. The acts and conduct of Defendants are willful, unfair, untrue and deceptive, in that they intend to mislead, deceive and confuse, and have had and continue to have the result of misleading, deceiving and confusing the public to believe that Defendants, Defendants' goods,

and/or the Infringing Horn are affiliated with, sponsored or controlled by Wolo. As a consequence, Defendants attempt to trade upon, and gain public acceptance and other benefits from Wolo's favorable reputation, which has accordingly, been placed at risk by Defendants' illegal acts and conduct.

88. The acts of Defendants constitute infringement of the Mark, and the use of a false designations of origin, false representations, and unfair competition, by inducing the erroneous belief that Defendants, Defendants' goods, and/or the Infringing Horn are in some manner affiliated with, originate from, and/or are sponsored by Wolo, and by misrepresenting the nature and/or origin of Defendants' goods, are all in violation of Lanham Act § 43(a), 15 U.S.C. § 1125(a).

89. The acts of Defendants have caused irreparable harm and damage to Wolo and will continue to cause irreparable harm to Wolo, and have caused and will continue to cause Wolo to suffer monetary damage in an amount thus far not determined.

90. Wolo has no adequate remedy at law for the injury alleged in this count, and said injury is, in part, intangible in nature and not capable of being fully measured or valued entirely in terms of monetary damages.

91. Notwithstanding the inadequacy of and the difficulty of presently fully ascertaining Wolo's monetary damages caused by Defendants' wrongful conduct, Wolo is informed and believes and, based upon such information and belief, alleges that said conduct has resulted in irreparable, direct and proximate damages to Wolo. Wolo seeks leave of this Court to amend its complaint to allege the full nature and extent of said monetary damages if, when and to the extent the damages are ascertained.

**COUNT IV**  
**FEDERAL UNFAIR COMPETITION (LANHAM ACT § 43(a))**

92. Wolo repeats and realleges each and every allegation contained in the prior paragraphs hereto, and the same are incorporated herein and made a part hereof.

93. Wolo has expanded large amounts of time and money to build up the notoriety, reputation and goodwill of Wolo, its trademarks and copyrights, including the Mark and the Work, and invested considerable amounts of resources in developing its products.

94. Wolo continuously utilizes Wolo's IP during the course of its everyday business, and the aggregate use and combination of Wolo's IP has resulted in Wolo's IP becoming a single source of identification for Wolo.

95. Defendants, without authorization from Wolo, and without spending a reasonable and fair amount of time and money to establish Defendants' own reputation and goodwill separate and apart from Wolo, are using Wolo's IP, and/or a combination thereof, constituting unfair competition in violation of the Lanham Act.

96. Defendants' use of Wolo's IP is causing, and/or is likely to cause, confusion, mistake, or to deceive as to the affiliation, connection, or association of Defendants with Wolo, or as to the origin, sponsorship, or approval of Defendants' goods and/or commercial activities by Wolo.

97. Wolo's goods and services are offered, sold, distributed, furnished and/or advertised to the same or similar classes of purchasers as Defendants' goods and services.

98. Upon information and belief, Defendants were aware of Wolo and of Wolo's IP prior to the time Defendants selected and commenced use of Wolo's IP, and/or combinations thereof.

99. Upon information and belief, based upon, without limitation, the similarity of Defendants' websites, products and/or materials and Wolo's IP, and Defendants' prior knowledge of Wolo and Wolo's use of Wolo's IP, Defendants adopted and used Wolo's IP with the intent to cause confusion among consumers and with the purpose of benefitting from Wolo's reputation and goodwill, constituting a false designation of origin and unfair competition.

100. The acts and conduct of Defendants are willful, unfair and deceptive, in that they intend to mislead, deceive and confuse, and have had and continue to have the result of misleading, deceiving and confusing the public to believe that Defendants and/or Defendants' goods are affiliated with, sponsored or controlled by Wolo. As a consequence, Defendants attempt to trade upon, and gain public acceptance and other benefits from Wolo's favorable reputation, which has accordingly, been placed at risk by Defendants' illegal acts and conduct.

101. The acts of Defendants constitutes the use of a false designations of origin, false representations, and unfair competition, by inducing the erroneous belief that Defendants and/or Defendants' are in some manner affiliated with, originate from, and/or are sponsored by Wolo, and by misrepresenting the nature and/or origin of Defendants' goods, are all in violation of Lanham Act § 43(a), 15 U.S.C. § 1125(a).

102. The acts of Defendants have caused irreparable harm and damage to Wolo and will continue to cause irreparable harm to Wolo, and have caused and will continue to cause Wolo to suffer monetary damage in an amount thus far not determined.

103. Wolo has no adequate remedy at law for the injury alleged in this count, and said injury is, in part, intangible in nature and not capable of being fully measured or valued entirely in terms of monetary damages.

104. Notwithstanding the inadequacy of and the difficulty of presently fully

ascertaining Wolo's monetary damages caused by Defendants' wrongful conduct, Wolo is informed and believes and, based upon such information and belief, alleges that said conduct has resulted in irreparable, direct and proximate damages to Wolo. Wolo seeks leave of this Court to amend its complaint to allege the full nature and extent of said monetary damages if, when and to the extent the damages are ascertained.

**COUNT V**  
**TRADEMARK INFRINGEMENT AND DILUTION**  
**AND DECEPTIVE ACTS AND PRACTICES**

105. Wolo repeats and realleges each allegation contained in the prior paragraphs hereto and the same are incorporated herein and made a part hereof.

106. The foregoing acts of Defendants constitute willful, deceptive acts and practices in the conduct of business, trade and/or commerce, in violation of New York Gen. Bus. Law § 349, for which Wolo is entitled to injunctive relief, actual damages, treble damages, punitive damages, attorneys' fees, and costs.

107. The forgoing acts of Defendants will create a likelihood of injury to the public image and business reputation of Wolo, in that the public will likely associate Defendants goods with Wolo's goods, and cause the dilution of the distinctive quality of Wolo's Mark and Wolo's IP, in violation of New York Gen. Bus. Law § 360-l, for which Wolo is entitled to injunctive relief.

108. The foregoing acts of Defendants were calculated and designed intentionally to mislead and deceive the public and trade as to the identity of Defendants or as to the connection of Defendant with Wolo, in violation of New York Gen. Bus. Law § 133, for which Wolo is entitled to injunctive relief.

**COUNT VI**  
**COMMON LAW INFRINGEMENT AND UNFAIR COMPETITION**

109. Wolo repeats and realleges each allegation contained in the prior paragraphs hereto and the same are incorporated herein and made a part hereof.

110. The acts of Defendants constitute trademark infringement and unfair competition in violation of the common law of the State of New York.

111. Upon information and belief, Defendants have intentionally appropriated Wolo's Mark and Wolo's IP with the intent of causing confusion, mistake and deception as to the source of Defendants' goods, with the intent to pass-off their goods as those of Wolo, and the bad faith intent to take advantage of Wolo's reputation, good will, and efforts and expenditures, and as such, Defendants have committed unfair competition in violation of the common law of the State of New York.

112. The foregoing acts of Defendants have created a likelihood of confusion between Defendants and Wolo and/or Defendants' products and Wolo's Products.

113. The foregoing acts of Defendants have injured and will continue to injure Wolo, by depriving it of sales of its genuine goods, by injuring its business reputation, and by passing off Defendants' goods as Wolo's genuine goods, all in violation of the common law of the State of New York.

114. Defendants' acts have caused irreparable harm and damage to Wolo and have caused Wolo monetary damage in an amount Wolo has not yet determined, for which Wolo is entitled to its actual damages, Defendants' profits, punitive damages, attorneys' fees and costs.

115. Wolo has no adequate remedy at law.

**JURY DEMAND**

Wolo demands a trial by jury on all issues.

**WHEREFORE**, Wolo demands judgment against Defendants in the form of an Order:

- A. Providing that Defendants' conduct serves to infringe Wolo's Copyright in the Work, in violation of 17 U.S.C. § 101 et seq.
- B. Directing Defendants to account for all gains, profits, and other benefits derived as a result of its infringement of the Copyright in the Work;
- C. Granting judgment for Wolo in an amount of the greater of the following: (a) the actual damages suffered by Wolo as a result of the above-described infringement and any additional profits of Defendants, or (b) for each infringement found by the Court, the statutory damages provided for under Section 504(c) of Title 17, United States Code, including the maximum allowable statutory damages for willful infringement;
- D. An injunction permanently and perpetually restraining and enjoining the Defendant Entities, their officers, deputies, agents, employees, representatives, and other persons in concert or participation therewith, including without limitation Defendant Feldman, from infringing in any respect the Copyright in the Work;
- E. Providing that Defendants' and/or their agents, officers, directors, servants, employees, attorneys, successors and assigns, and/or all others in active concert or participation with Defendants be ordered and required to remove and any and all portions of the Work from any and all websites and/or online posting and/or offerings that are owned and/or operated by Defendants jointly and/or severally;

F. Providing that Defendants' conduct serves to infringe Wolo's Mark, falsely designate the origin of Defendants' goods and services, falsely describe such goods, and unfairly compete with Wolo, all in violation of Lanham Act § 43(a), 15 U.S.C. § 1125.

G. Providing that Defendants' conduct constitutes willful, deceptive acts and practices in the conduct of business, trade and/or commerce, in violation of New York Gen. Bus. Law § 349;

H. Providing that Defendants' conduct will create a likelihood of dilution and injury to Wolo's business reputation in violation of New York Gen. Bus. Law §§ 360-l.

I. Providing that Defendants used Wolo's Mark and/or Wolo's IP with the intent to cause confusion and to deceive the public in violation of New York Gen. Bus. Law. § 133.

J. Providing that Defendants have injured Wolo by depriving it of sales of its genuine goods and services, by injuring its business reputation, and by passing off Defendants' goods as Wolo's goods and/or created a likelihood of confusion and/or false designation of origin, all in violation of the common law of the State of New York.

K. Providing that Defendants and their agents, officers, directors, servants, employees, attorneys, their successors and assigns, and all others in active concert or participation with Defendants be preliminarily and permanently enjoined from directly or indirectly:

- a. Using Wolo's Mark, any confusingly similar mark, or any other marks which are similar to or are colorable imitations of Wolo's Mark, alone or as a part of, or together with, any other designs, word or words, trademark, service mark, trade name, trade dress or other business or commercial designation or any logo, symbol or design;

- b. Committing any act which, in and of itself, or from the manner or under the circumstances in which it is done amounts to false designation of origin, false description or false representation of Defendants' goods and services; and
- c. Otherwise unfairly competing with Wolo or committing dilution or infringement of Wolo's rights.

L. Providing that the Court issue an Order directing Defendants to file with the Court and serve on Wolo, within thirty (30) days after the service on Defendants of such injunctions, a report in writing and under oath, setting forth in detail the manner and form in which Defendants have complied with the injunction.

M. That the Court award judgment in favor of Wolo for the damages sustained by Wolo and for Defendants' profits, as a result of Defendants' wrongful conduct.

N. That the Court award judgment in favor of Wolo in the amount of treble damages.

O. That the Court award judgment against Defendants for the full costs of this action, including reasonable attorneys' fees.

P. That the Court award to Wolo punitive damages sufficient to deter Defendants from committing such willful acts of infringement in the future.

Q. For interest on all amounts found to be due to Wolo from Defendants, at the prevailing rate, from the date said amounts or any part thereof became or become due.

R. That the Court require Defendants to notify their respective commercial associates, suppliers and customers of this Order.

S. That the Court order such other, further and different relief as the nature of this action may require and that the Court may deem just and proper.

T. That the Court retain jurisdiction of this action for the purpose of enabling Wolo to apply to the Court, at any time, for such further orders and directions as may be necessary or appropriate for the interpretation or execution of any order entered in this action, for the modification of any such order, for the enforcement or compliance therewith and for the punishment of any violations thereof.

Dated: Scarsdale, New York  
September 12, 2017

Respectfully submitted,

**LACKENBACH SIEGEL LLP**

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[JRollings@LSLLP.com](mailto:JRollings@LSLLP.com)  
*Attorneys for Wolo Manufacturing Corp.*

# **Exhibit 1**

To Complaint

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Kayleigh Clayett".

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-391-412**

Effective Date of Registration:  
August 21, 2017

## Title

---

**Title of Work:** Model 853 Philly Express Train Horn

## Completion/Publication

---

**Year of Completion:** 2008  
**Date of 1st Publication:** December 31, 2008  
**Nation of 1<sup>st</sup> Publication:** United States

## Author

---

- **Author:** Wolo Manufacturing Corp.
- Author Created:** text, artwork
- Work made for hire:** Yes
- Citizen of:** United States

## Copyright Claimant

---

**Copyright Claimant:** Wolo Manufacturing Corp.  
1 Saxwood Street, Deer Park, NY, 11729, United States

## Rights and Permissions

---

**Organization Name:** Lackenbach Siegel LLP  
**Name:** Robert B. Golden  
**Email:** rgolden@lslp.com  
**Telephone:** (914)723-4300  
**Address:** One Chase Road  
Lackenbach Siegel Bldg., Penthouse Fl.  
Scarsdale, NY 10583 United States

## Certification

---

**Name:** Robert B. Golden  
**Date:** August 21, 2017  
**Applicant's Tracking Number:** WOLOM.GEN

---

\*0000TX00083914120202\*



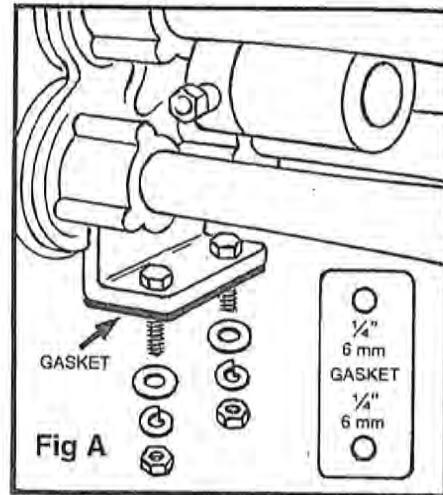
# INSTALLATION INSTRUCTIONS

## FOR MODEL 853 PHILLY EXPRESS TRAIN HORN

Your purchase of a Philly Express Train Horn is the perfect choice to compliment your vehicle. Wolo's products are manufactured with the finest materials. Each horn is tested to insure it meets all manufacturing specifications, before it is packaged. If you need help installing your new Wolo horn, our technicians are available to answer your questions, Monday thru Friday, 9 AM to 4 PM EST at 1-888-550-HORN (4676).

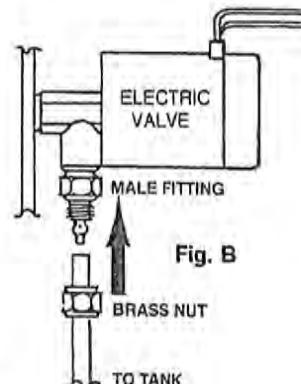
### HORN INSTALLATION (Fig. A)

1. Locate a mounting location that is a solid metal surface such as the vehicle's frame or chassis to help prevent excessive vibration, which could damage the horn. **IMPORTANT:** Do not mount horn on a plastic fender well or flexible material. For best results, the front of the horn should be unobstructed so that the sound can carry straight ahead.
2. Use the base of the horn as a template, mark the hole locations and drill to size.
3. Place the gasket between the mounting surface and the base of the horn.
4. Secure the horn with the hardware provided and tighten evenly.



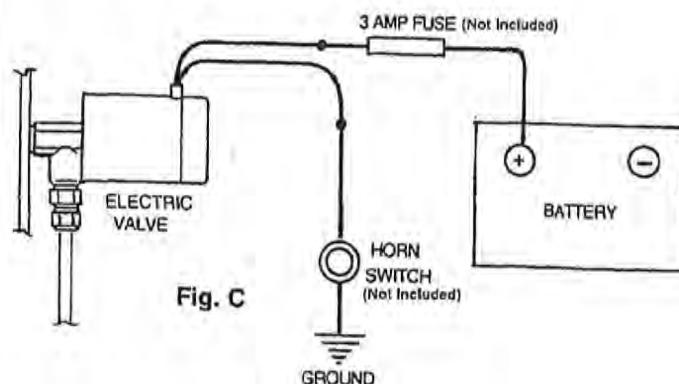
### HOSE INSTALLATION (Fig. B)

5. Use 1/4" O.D. plastic hose (not provided), cut to size in order to connect the horn's electric solenoid valve to the tank of the vehicle's high pressure on-board air system.
6. Place the brass nut onto the end of the air hose. Push the hose onto the male inlet fitting located on the electric solenoid valve.
7. Thread brass nut onto the male fitting and tighten. **CAUTION:** Do not over tighten brass nut.
8. Connect the other end of the hose to the vehicle's on-board air tank. Make sure that the on-board air system has no pressure before attempting to connect hose to tank. **IMPORTANT:** NEVER INSTALL THE HORN TO AN AIR TANK THAT CONTROLS THE AIR BRAKES OR ANY OTHER CRITICAL OPERATING SYSTEM.



### ELECTRIC VALVE WIRING (Fig. C)

9. Connect one (1) wire from the electric valve to the positive (+) battery terminal, alternator, etc. Always protect this circuit with a three (3) amp fuse (not included).
10. Connect the other wire of the electric solenoid valve to the horn switch (not included).
11. Connect the horn switch's other terminal to ground, any metal body bolt that is clean of paint and rust.



### **Warranty**

Wolo Manufacturing Corporation ("Wolo") warranties to the original purchaser, for three months from the date of purchase, that this product is free from defects in workmanship and materials. If there is such a proven defect, Wolo, at its option, will either repair or replace the item free of charge, if it is returned to Wolo within three months from the date of purchase together with proof of purchase as described below. Wolo reserves the right to inspect any defect prior to settling any warranty claim by repair or replacement. This warranty is limited as above provided and Wolo will not be responsible for fire or other casualty or accident, due to neglect, abuse, abnormal use, modifications, faulty installation of this product, or natural causes.

ANY EXPRESSED WARRANTY NOT PROVIDED HEREIN IS EXCLUDED AND DISCLAIMED. THE IMPLIED WARRANTIES OF MERCHANTABILITY AND OF FITNESS FOR A PARTICULAR PURPOSE ARE EXPRESSLY LIMITED TO A TERM OF THREE (3) MONTHS. UNDER NO CIRCUMSTANCES SHALL WOLO BE LIABLE TO PURCHASER OR ANY OTHER PERSON FOR ANY SPECIAL OR CONSEQUENTIAL DAMAGES, WHETHER ARISING OUT OF BREACH OF WARRANTY OR OTHERWISE.

To obtain warranty service, return the product prepaid, and include the original bill of sale showing the date of purchase. Provide with the return a brief description of the problem. Also, include with the return a check or money order in the amount of \$10.00 to cover return shipping. Mail to:

Wolo Manufacturing Corp.  
One Saxwood Street, Deer Park, NY 11729  
Attn: Warranty Service  
E-mail: [tech@wolo-mfg.com](mailto:tech@wolo-mfg.com)

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# **Exhibit 2**

To Complaint



# **Exhibit 3**

To Complaint


**AIR HORNS**  
**INSTALLATION INSTRUCTIONS**  
**VXH4114**
**Before Getting Started**

Read over the entire instruction guide before beginning with installation.  
 Vixen Horns highly recommends professional installation for this product.

**Kit Contents:**

- Chrome Plated Trumpets
- 1/4" NPT 12v Electric Valve (Solenoid) with compression fitting
- 1/4" OD Plastic Hose
- Mounting Hardware



**IMPORTANT:** This horn uses 12 volt DC components. Only install it to a 12 volt DC power source.

**Important Safety Instructions****CAUTION: To prevent the risk of electrical shock or electrocution:**

- Do not disassemble any electrical components of this horn.
- Do not touch any part of the compressor with your bare hands during or immediately after use.
- Do not operate any component where it can fall or be submerged into water.
- Do not reach for or touch any component that has fallen or been submerged into water.
- Use only in well ventilated areas.
- Do not sound the air horn in close proximity to another person's or your own ear(s).

**Safety During Installation**

- Disconnect the ground of your battery before beginning your installation.
- Use eye protection when operating drills.

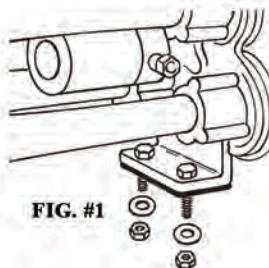
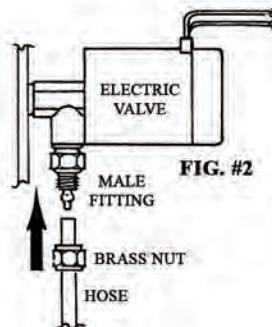
**Trumpet Mounting FIG. #1**

1. Locate a mounting area that is a solid metal surface such as the vehicle's frame or chassis to help prevent excessive vibration that could damage the horn.

**IMPORTANT:** Do not mount horn on a plastic fender well or any flexible material. For best results, the front of the horn should be unobstructed so that the sound can carry straight ahead.

2. Use bracket as a template, mark the hole locations and drill to size.

3. Secure the horn with the hardware provided and tighten evenly.

**FIG. #1****FIG. #2****Plastic Tubing Installation FIG. #2**

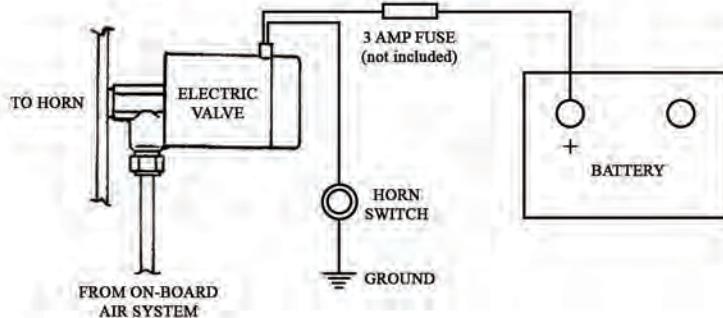
4. Using provided 1/4" plastic hose connect the horn's electric solenoid valve to your existing onboard air system.
5. Place the brass nut onto one end of the air hose. Push the tube onto the male inlet fitting located on the electric solenoid valve.
6. Thread brass nut onto the inlet fitting and tighten.
7. Get the other end of the hose and place the air tank fitting's brass nut onto it. Push the hose onto the tank's male fitting and tighten the brass nut.

**CAUTION: Do not over tighten brass nut.**

Make sure that the onboard air system has no pressure before attempting to connect hose to the tank.

**AIR HORNS**  
**INSTALLATION INSTRUCTIONS**  
VXH4114**Wiring the Electric Valve FIG. #3**

8. Connect one (1) wire from the electric valve to the positive (+) battery terminal or alternator, etc. We recommend using a 3-ampere fuse (not included) to protect the circuit.
9. Connect the other wire of the electric solenoid valve to the horn switch.
10. Connect the horn switch's other terminal to the ground or any metal body bolt that is clean of paint and rust.

**FIG. #3**



# AIR HORNS

## INSTALLATION INSTRUCTIONS

VXH4114B

### Before Getting Started

Read over the entire instruction guide before beginning with installation.  
Vixen Horns highly recommends professional installation for this product.

### Kit Contents:

- Quad Black Painted Trumpets
- 1/4" NPT 12v Electric Valve (Solenoid) with compression fitting
- 1/4" OD Plastic Hose
- Mounting Hardware



**IMPORTANT:** This horn uses 12 volt DC components. Only install it to a 12 volt DC power source.

### Important Safety Instructions

#### CAUTION: To prevent the risk of electrical shock or electrocution:

- Do not disassemble any electrical components of this horn.
- Do not touch any part of the compressor with your bare hands during or immediately after use.
- Do not operate any component where it can fall or be submerged into water.
- Do not reach for or touch any component that has fallen or been submerged into water.
- Use only in well ventilated areas.
- Do not sound the air horn in close proximity to another person's or your own ear(s).

### Safety During Installation

- Disconnect the ground of your battery before beginning your installation.
- Use eye protection when operating drills.

### Trumpet Mounting FIG. #1

1. Locate a mounting area that is a solid metal surface such as the vehicle's frame or chassis to help prevent excessive vibration that could damage the horn.

**IMPORTANT:** Do not mount horn on a plastic fender well or any flexible material. For best results, the front of the horn should be unobstructed so that the sound can carry straight ahead.

2. Use bracket as a template, mark the hole locations and drill to size.

3. Secure the horn with the hardware provided and tighten evenly.

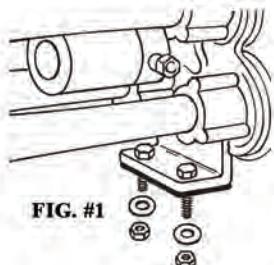


FIG. #1

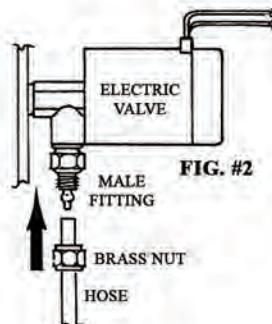


FIG. #2

### Plastic Tubing Installation FIG. #2

4. Using provided 1/4" plastic hose connect the horn's electric solenoid valve to your existing onboard air system.

5. Place the brass nut onto one end of the air hose. Push the tube onto the male inlet fitting located on the electric solenoid valve.

6. Thread brass nut onto the inlet fitting and tighten.

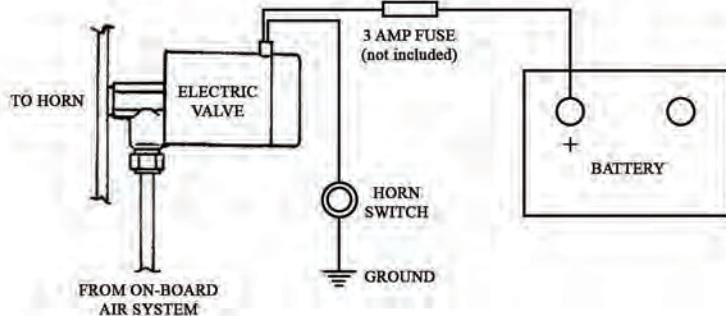
7. Get the other end of the hose and place the air tank fitting's brass nut onto it. Push the hose onto the tank's male fitting and tighten the brass nut.

**CAUTION: Do not over tighten brass nut.**

Make sure that the onboard air system has no pressure before attempting to connect hose to the tank.

**AIR HORNS**  
**INSTALLATION INSTRUCTIONS**  
**VXH4114B****Wiring the Electric Valve FIG. #3**

8. Connect one (1) wire from the electric valve to the positive (+) battery terminal or alternator, etc. We recommend using a 3-ampere fuse (not included) to protect the circuit.
9. Connect the other wire of the electric solenoid valve to the horn switch.
10. Connect the horn switch's other terminal to the ground or any metal body bolt that is clean of paint and rust.

**FIG. #3**

# **Exhibit 4**

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VIXEN HORNS VXH4114 FOUR TRUMPET TRAIN AIR HORN CHROME

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## HORNS

# VIXEN HORNS VXH4114 FOUR TRUMPET TRAIN AIR HORN CHROME

SKU: VXH4114

Tag: Air Horns

Color: Chrome, Sound Output: 149dB, Operating pressure: 60-150 psi,

Construction: Metal, 12V Electric Air Valve (solenoid), 1/4" OD Nylon Plastic

Hose (6 Feet), Mounting Hardware Included



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Four Metal Trumpets Air Horn. Will produce a loud powerful sound at 149dB.

All the trumpets are chrome plated metal, with a black painted base. Great for Car, Truck, SUV, RV, Boat. Comes with a 12 volt electric valve (solenoid), mounting hardware, 6 ft. 1/4" OD high pressure hose and installation instructions.

- Four Trumpet Train Air Horn
- Color: Chrome
- Sound Output: 149dB
- Operating pressure: 60-150 psi
- 12V Electric Air Valve (solenoid)
- Construction: Metal
- 1/4" OD Nylon Plastic Hose (6 Feet)
- Mounting Hardware Included
- Dimensions:
  - Trumpets: 13-3/4" L, 11-1/2" L, 9-1/4" L, 7-3/4" L x 3-3/4" D
  - Overall: 14" L x 6-3/4" W x 6-1/2" H

Note: Onboard Air System Required

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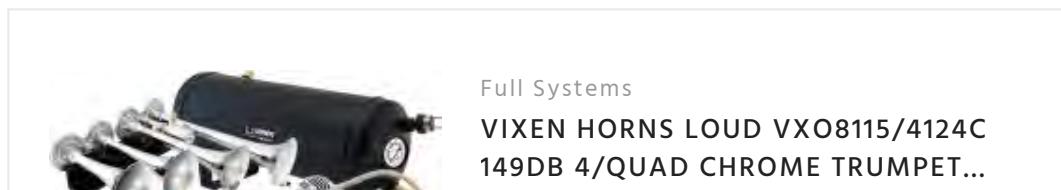
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VXH4114 Four Trumpet Train Air Horn



Color: Chrome, Sound Output: 149dB, Operating pressure: 60-150 psi, Construction: Metal, 12V Electric Air Valve (solenoid), 1/4" OD Nylon Plastic Hose (6 Feet), Mounting Hardware Included

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Four Metal Trumpets Air Horn. Will produce a Loud Powerful Sound at 149dB. All the trumpets are chrome plated metal, with a black painted base. Great for Car, Truck, SUV, RV, Boat. Comes with a 12 volt electric valve (solenoid), mounting hardware, 6 ft. 1/4" OD high pressure hose and installation instructions.

- Four Trumpet Train Air Horn
- Color: Chrome
- Sound Output: 149dB
- Operating pressure: 60-150 psi
- 12V Electric Air Valve (solenoid)
- Construction: Metal
- 1/4" OD Nylon Plastic Hose (6 Feet)
- Mounting Hardware Included
- Dimensions:
  - Trumpets: 13-3/4" L, 11-1/2" L, 9-1/4" L, 7-3/4" L x 3-3/4" D
  - Overall: 14" L x 6-3/4" W x 6-1/2" H

Note: Onboard Air System Required



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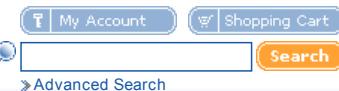
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# **Exhibit 6**

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**VXH4114 Four Trumpet Train Air Horn**


Color: Chrome, Sound Output: 149dB, Operating pressure: 60-150 psi, Construction: Metal, 12V Electric Air Valve (solenoid), 1/4" OD Nylon Plastic Hose (6 Feet), Mounting Hardware Included

List price: \$129.95  
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Four Metal Trumpets Air Horn. Will produce a Loud Powerful Sound at 149dB. All the trumpets are chrome plated metal, with a black painted base. Great for Car, Truck, SUV, RV, Boat. Comes with a 12 volt electric valve (solenoid), mounting hardware, 6 ft. 1/4" OD high pressure hose and installation instructions.

- Four Trumpet Train Air Horn
- Color: Chrome
- Sound Output: 149dB
- Operating pressure: 60-150 psi
- 12V Electric Air Valve (solenoid)
- Construction: Metal
- 1/4" OD Nylon Plastic Hose (6 Feet)
- Mounting Hardware Included
- Dimensions:
  - Trumpets: 13-3/4" L, 11-1/2" L, 9-1/4" L, 7-3/4" L x 3-3/4" D
  - Overall: 14" L x 6-3/4" W x 6-1/2" H

Note: Onboard Air System Required



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# **Exhibit 7**

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**Vixen Horns**

**Vixen Horns Loud 149dB 4/Four Trumpet Train Air Horn with 12V Electric Solenoid Chrome VXH4114**

★★★★★ 59 customer reviews | 23 answered questions

Price: **\$56.95** & FREE Shipping. [Details](#)

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Want it tomorrow, Aug. 31? Order within **4 hrs 19 mins** and choose **One-Day Shipping** at checkout. [Details](#)

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Size: **4 Trumpets Stacked Two/Two - CH**

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[1 Trumpet Round + Weather Cover + Light - CH](#)

[1 Trumpet Round + Weather Cover - BK](#)

[1 Trumpet Round + Weather Cover - CH](#)

[1 Trumpet Round - BK](#) [1 Trumpet Round - CH](#)

[3 Trumpets In-Line - BK](#) [3 Trumpets In-Line - CH](#)

[3 Trumpets Stacked Two/One - BK](#)

[3 Trumpets Stacked Two/One - CH](#)

[4 Trumpets Stacked Two/Two - BK](#)

**4 Trumpets Stacked Two/Two - CH**

- This product requires an Onboard Air System
- Color: Chrome, Sound Output: 142dB
- 12V Electric Air Valve (solenoid)
- 1/4 inch OD Nylon Plastic Hose (6 Feet)
- Mounting Hardware Included

[See more product details](#)

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**Kleinn Air Horns 318 Detonator with Red Push Button**  
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\$10.76



**Kleinn Air Horns 307 Vortex 4 12-Volt Air Horn Solenoid Valve**  
★★★★★ 40  
\$23.25



**Viair 90007 Air Source Relocation Kit**  
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\$18.14



**1/4" OD x 50' SAE J844 Nylon Air Brake Tubing**  
Suspension Horn Train Lowrider  
★★★★★ 51  
\$17.83



**Vixen Horns 120-150 Air Pressure Switch T-Mount Type 1/4" NP**  
12V/24V for Train/Ai  
★★★★★ 44  
\$8.95

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Size: 4 Trumpets Stacked Two/Two - CH

- Your cost could be \$6.95 instead of \$56.95! Get a [\\$50 Amazon.com Gift Card](#) instantly upon approval for the Amazon Rewards Visa Card [Apply now](#)

## Have a question?

Find answers in product info, Q&As, reviews



## Product information

Size:4 Trumpets Stacked Two/Two - CH

### Technical Details

Brand	Vixen Horns
Model	VXH4114
Item Weight	4.8 pounds
Package Dimensions	16.5 x 9 x 9 inches
Item model number	VXH4114
Manufacturer Part Number	VXH4114

### Technical Specification

[User Manual \[pdf\]](#)

### Additional Information

ASIN	B015QBV88A
Customer Reviews	 <a href="#">59 customer reviews</a> 4.1 out of 5 stars
Best Sellers Rank	#35,108 in Automotive ( <a href="#">See top 100</a> ) #24 in <a href="#">Automotive &gt; Exterior Accessories &gt; Horns &amp; Accessories &gt; Air Horns</a> #1,539 in <a href="#">Automotive &gt; Replacement Parts &gt; Lighting &amp; Electrical &gt; Electrical</a>
Shipping Weight	4.8 pounds ( <a href="#">View shipping rates and policies</a> )
Date First Available	November 20, 2016

### Warranty & Support

Warranty, Parts: Parts

**Product Warranty:** For warranty information about this product, please [click here](#)

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### Product description

Size:4 Trumpets Stacked Two / Two - CH

Four Metal Trumpets Air Horn. Will produce a Loud Powerful Sound at 149dB. All the trumpets are chrome plated metal, with a black painted base. Great for Car, Truck, SUV, RV, Boat. Comes with a 12 volt electric valve (solenoid), mounting hardware, 6 ft. 1/4" OD high pressure hose and installation instructions. Four Trumpet Train Air Horn Color: Chrome Sound Output: 149dB Operating pressure: 60-150 psi Construction: All metal, with chrome plated trumpets Air Valve: 12 volt electric solenoid Mounting Hardware Included Horn Size: 13-3/4", 11-1/2", 9-1/4", 7-3/4" with 3-3/4" diameter each Note: Onboard Air System Required



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Vixen Horns offers the most comprehensive line of air horns, sirens and air accessories. Our quality engineered components have become the industry standard for 12-volt and 24-volt automotive aftermarket applications worldwide.

Our goal is to consistently deliver performance, reliability and value to our customers; providing the ultimate Sound Source at the best price.

### Marine Grade Electric Train Horn 12V

This powerful maintenance free dual trumpet electric horn will sound at 125dB and has a 100% non-magnetic stainless steel housing with a bright polished finish that will not rust. Specially designed for exterior use, is ideal for marine applications in salt water environment but can also be used on other vehicles. The connection is simple with this horn, only two wires, and does not require an onboard air system, this means that you don't need a compressor or air tank to start roaring the seas.

- Sound Output: 125 dB
- Maximum Rust Protection
- Maintenance Free
- No Air System Needed!

## Highlights

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12 volt powered.

Ideal for 12 volt application such as Boats, RVs, SUVs and Trucks.

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Bracket

Trumpet bracket with rubber to reduce vibration.

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No Air System Required

Fully electric horn, no compressor, air tank or hoses needed.



## Need additional information?

A detailed installation instruction manual and sound clip of this product can be found on our website.

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## Customer Questions & Answers

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## Customer reviews

 59

4.1 out of 5 stars ▾



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### Top customer reviews

 Uncle Sam Approved!

By [Josh](#) on July 24, 2016

Size: 3 Trumpets Stacked Two/One - CH | [Verified Purchase](#)

Incredibly loud, although not as low pitched as I had hoped. The trumpets unscrew from the diaphragms and I removed the 12v solenoid. I plumbed them through a manual momentary push button valve and used them as part of a parade float! My only complaint is the mount is inadequate for the weight of these horns. I used a stainless machine screw and actually drilled a hole in the bell of the longest horn to stop it from bouncing. It might be ok out of the wind of attached to the solid frame of a vehicle but I would still be worried that it could snap. I had an 11 gallon air tank filled to 100 psi and no on board compressor. I got plenty of use out of these horns on parade day and still had about 80psi in the tank when I parked it. It was a hoot! (Pun intended)



[Comment](#) | 6 people found this helpful. Was this review helpful to you?   [Report abuse](#)

 Like a Train

By [Glenn Lord](#) on March 30, 2016

Size: 3 Trumpets Stacked Two/One - CH | [Verified Purchase](#)

I made a mistake and thought this had its own compressor but I kept it and used an axillary tank. It is for a kids train ride and it is extremely loud. It sounds just like a train and I grew up next to a train yard. Got air? Its as good as it gets.

[Comment](#) | 5 people found this helpful. Was this review helpful to you?   [Report abuse](#)

 This horn is nice and loud

By [Darren](#) on April 16, 2017

Size: 4 Trumpets Stacked Two/Two - CH | [Verified Purchase](#)

This horn is nice and loud. Not a true train horn but it's good enough for my set up. I removed the quarter inch connecter because it's way too small and ran a 3/8" hose to it with 150 psi and it wails!. The mounting



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### Customer images



[See all customer images](#)

### Most recent customer reviews

 Five Stars

great sound

Published 27 days ago by Marlin R Koehn

 Its loud. Running at 150psi with no issues. ...

Its loud. Running at 150psi with no issues. operates at a lower psi than expected. I was down to about 40 psi or so and it still sounded off.

Published 29 days ago by andrew demiar

 Loud as Hell

Super loud, the only thing that I changed was the size of the air hose that it comes with. the one supplied is 1/4 outside diameter with 1/8 inch inside diameter, which I feel is... [Read more ▾](#)

Published 1 month ago by Don

 Five Stars

excelente

Published 1 month ago by Rafael Rolando Vasquez Caraballo

 One Star

Didn't come with all the parts like advertised

bracket is too small and flimsy so I used a piece of 2" angle iron. The horns seemed not to screw in very tightly so I used some loctite on them. I gave them 5 stars even though I had a few issues with them because you can't get a set of horns like this for 56 bucks anywhere else.

Published 2 months ago by Amazon Customer

**Comment** | One person found this helpful. Was this review helpful to you?   Report abuse

### ★★★★★ Neither a 'big rig' nor 'train' sound, still very pleasing.

By Garrett C. on May 3, 2017

Size: 4 Trumpets Stacked Two/Two - BK | **Verified Purchase**



I'm sure my neighbors 'loved me' when I finished up installing this on my Freightliner M2 at 9 o'clock at night and tested it! The horns are not the 'big rig' sound that I thought I was getting, but rather a very bright 'toot' noise which is also not similar to a train horn. Overall, despite my expectations, I'm still very happy with the horn.

Published 3 months ago by Amazon Customer

### ★★★★★ Truck gone train !

Sounds just like a train !

Published 3 months ago by Amazon Customer

### ★★★★★ LOUD AS HELL

These bad boys are super loud..... seem to be very well made. I'm using an onboard 125psi portable air tank, with that these things scream.

Published 4 months ago by Michael

### ★★★★★ Three Stars

not as loud as I thought it would be. but still fun  
Published 5 months ago by Amazon Customer

### ★★★★★ Five Stars

Came with every to hook it up other than the switch to hook it up

Published 5 months ago by Shawn Wilcox

**Comment** | One person found this helpful. Was this review helpful to you?   Report abuse

### ★★★★★ THESE ARE AWESOME! Installation took less than an hour

By Amazon Customer on July 6, 2016

Size: 3 Trumpets In-Line - BK | **Verified Purchase**

THESE ARE AWESOME! Installation took less than an hour. I tested these in my garage prior to installing under my jeep and was very impressed. I have several others that will be ordering since they have heard mine. Only observation/concern that I have is how the finish will hold up during the winter here in the midwest.

### Search customer reviews



**Comment** | 3 people found this helpful. Was this review helpful to you?   Report abuse

### ★★★★★ Functional.

By Richard D. Glass on February 3, 2017

Size: 4 Trumpets Stacked Two/Two - CH | **Verified Purchase**

Not a train horn. Loud but just not the right tone. Don't be fooled by misrepresentation. Train horns cost hundreds of dollars. As an air horn, it is loud, just not what I was looking for. The mounting bracket is flimsy. You would need to fabricate a sturdier one, as the supplied one will break rather quickly. Will resale mine.

**Comment** | Was this review helpful to you?   Report abuse

### ★★★★★ Loud enough for heavy equipment

By Chester Schlosser on January 2, 2017

Size: 1 Trumpet Round - CH | **Verified Purchase**

Not like crazy loud to hurt your ears but you can hear it from a long ways away. Works great On heavy machinery and it looks like it won't Shake apart. Lasted a year so far

**Comment** | Was this review helpful to you?   Report abuse

### ★★★★★ Four Stars

By Gene Mulholland on August 14, 2016

Size: 3 Trumpets In-Line - BK | **Verified Purchase**

Not as loud as The larger, but more compact and easier to mount.

**Comment** | One person found this helpful. Was this review helpful to you?   Report abuse

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VIXEN HORNS VXH1608CB COMPACT DUAL-TONE MOTORCYCLE ELECTRIC AIR HORN CARBON-FIBER BLACK





#### ELECTRIC HORNS

# VIXEN HORNS VXH1608CB COMPACT DUAL-TONE MOTORCYCLE ELECTRIC AIR HORN CARBON-FIBER BLACK

SKU: VXH1608CB

Tag: Electric Horns

Color: Carbon-Fiber Black Pattern, Sound Output: 139dB, One-piece design, Maximum rust protection, Maintenance-free compressor, Twice as loud as many factory horns, No Air Tubes or External Air Supply Needed



ADD TO COMPARE



## DESCRIPTION

This Compact Size Loud Dual Tone Air Horn can fit easily on a Motorcycle, Car, Boat, ATV and other vehicles with a 12 Volt electrical system. Its one-piece design which requires no hoses and installs in minutes with a single bolt by simply transferring the factory horn wires to the compressor. The compressor is made of steel and horn of high impact resistant plastic high-tech carbon-fiber look. Comes with mounting hardware, horn relay and installation instructions.

- Compact Dual-Tone Electric Air Horn
- Color: Carbon-Fiber Black Pattern
- Sound Output: 139dB (High 510Hz / Low 410Hz)
- Power Source: 12V (18-25A)
- One-piece design
- Maximum rust protection
- Maintenance free compressor
- 4-PIN Relay Included
- Twice as loud as many factory horns
- No Air Tubes or External Air Supply Needed
- Specially design for motorcycles but can also be use on any vehicle where space is limited
- Dimensions: 5-3/4" L x 3-1/2" W x 4-1/2" H

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